

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Blvd, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants  
19 FIDELITY NATIONAL TITLE GROUP, INC. and FIDELITY  
20 NATIONAL TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652  
24 2950 E. Flamingo Road, Suite L  
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELL FARGO BANK, N.A.,

Case No.: 2:21-CV-00996-APG-DJA

Plaintiff,

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
COMPLAINT (ECF No. 1)**

vs.

**FIRST REQUEST**

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

29 COMES NOW defendants Fidelity National Title Group, Inc. (“FNTG”) and Fidelity  
30 National Title Insurance Company (“Fidelity”) (collectively “Defendants”) and plaintiff Wells  
31 Fargo Bank, N.A. (“Wells Fargo”), by and through their respective attorneys of record, which  
32 hereby agree and stipulate as follows:

1       1. On May 24, 2021 Wells Fargo filed its complaint in the Eighth Judicial District  
2 Court for the State of Nevada;

3       2. On May 24, 2021, Fidelity removed the instant case to the United States District  
4 Court for the State of Nevada (ECF No. 1);

5       3. Fidelity's response to Wells Fargo's complaint is currently due on June 29, 2021,  
6 while FNTG's response is currently due on July 2, 2021;

7       4. Counsel for Defendants request a 35-day extension for FNTG (38 days for  
8 Fidelity) through and including Friday, August 6, 2021 for Defendants to file their respective  
9 responses to Wells Fargo's complaint to afford Defendants' counsel additional time to review and  
10 respond to Wells Fargo's complaint.

11       5. Counsel for Wells Fargo does not oppose the requested extension;

12       6. This is the first request for an extension made by counsel for Defendants, which is  
13 made in good faith and not for the purposes of delay.

14       7. This stipulation is entered into without waiving any of Defendants' objections  
15 under Fed. R. Civ. P. 12.

16       //

17       //

18       //

19       //

20       //

21       //

22       //

23       //

24       //

25       //

26       //

27       //

28       //

1           **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to  
2 the complaint are hereby extended through and including Friday, August 6, 2021.

3           Dated: June 23, 2021

SINCLAIR BRAUN LLP

5           By: /s/-Kevin S. Sinclair

6           KEVIN S. SINCLAIR  
7           Attorneys for Defendants  
8           FIDELITY NATIONAL TITLE GROUP,  
9           INC. and FIDELITY NATIONAL TITLE  
10           INSURANCE COMPANY

11           Dated: June 23, 2021

12           WRIGHT FINLAY & ZAK, LLP

13           By: /s/-Darren T. Brenner

14           DARREN T. BRENNER  
15           Attorneys for Plaintiff  
16           WELLS FARGO BANK, N.A.

17           **IT IS SO ORDERED.**

18           Dated this 24th day of June, 2021.

19             
20           DANIEL J. ALBREGTS  
21           UNITED STATES MAGISTRATE JUDGE